

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Defendants.

Case No. 2:14-cv-0288-JAD-GWF

1. "PMK" of Las Vegas Metropolitan Police Department;
2. "PMK" of the Clark County District Attorney's Office;
3. "PMK" of Clark County, Nevada;
4. Christopher Lalli, Esq.
5. Frank Coumou, Esq.

6. Peter Thunell, Esq.
7. Michelle Anthony, Esq.
8. Aaron Nance, Esq.
9. Phillip J. Kohn, Esq.
10. Benjamin Saxe, Esq.
11. Tom Roberts
12. Officer Scott Friedman
13. Officer Richard Zaccara

Additionally, Plaintiff's counsel intends to depose Alexandra Chrysanthis, Esq., Craig Hendricks, Esq., Michael Radovic, Esq. and Brett Keller, Esq.. All four individuals were formerly employed by the Clark County District Attorney's Office.

Although this may appear to be a large number of depositions, the majority of them are not anticipated to last more than an hour and several can be taken on the same day. Further, the parties anticipate the majority, if not all, of the above-identified individuals will be deposed within the next two weeks. This stipulation is being filed merely for the purpose of accommodating the busy schedules of the various witnesses, many of whom are attorneys, who would otherwise have to appear on the currently scheduled dates prior to the close of discovery. Plaintiff's counsel has represented that no other depositions will be noticed apart from the ones involving the individuals identified in this stipulation. Neither side will engage in any written discovery. Thus, as indicated above, this is not an extension of discovery *per se* but instead merely a request seeking approval to complete certain depositions outside the close of discovery.

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1 The parties respectfully request that the Court approve this stipulation which is not filed
2 for the purpose of delay but rather merely to accommodate the busy schedules of various
3 witnesses and for the purpose of completing depositions that were otherwise timely noticed.

4 Respectfully submitted,

5 */s/ Lucinda L. Coumou*

/s/ Paul S. Padda

6 Lucinda L. Coumou, Esq.
7 Chief Deputy District Attorney, Civil Division
Clark County District Attorney's Office

Paul S. Padda, Esq.
Paul Padda Law

8 Attorney for Defendants Clark County, Nevada
and the Clark County District Attorney's Office

Attorney for Plaintiff

Dated: October 27, 2016

9 Dated: October 27, 2016

10 */s/ Robert W. Freeman, Jr.*

11 Robert W. Freeman, Jr., Esq.
12 Lewis Brisbois Bisgaard & Smith

13 Attorney for Las Vegas Metropolitan Police Department
14 and Officers R. Zaccara and S. Friedman

15 Dated: October 27, 2016

16 **IT IS SO ORDERED:**

17 The Court hereby approves the parties' stipulation filed
18 pursuant to Federal Rule of Civil Procedure 29. The
19 parties represent that they are not seeking an extension
20 of the discovery period but instead seek merely to
21 complete depositions that were timely noticed prior to
22 the close of discovery. Plaintiff's counsel shall file a
status report on or before November 18, 2016 indicating
which depositions identified in the stipulation have been
completed. No discovery beyond completion of the
depositions of the individual witnesses identified in the
stipulation shall be permitted.

23 
24 UNITED STATES MAGISTRATE JUDGE

25 Dated: October 28th, 2016